

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

JASON ALFORD, DANIEL LOPER, WILLIS MCGAHEE, MICHAEL MCKENZIE, JAMIZE OLAWALE, ALEX PARSONS, ERIC SMITH, CHARLES SIMS, JOEY THOMAS, and LANCE ZENO, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

THE NFL PLAYER DISABILITY & SURVIVOR BENEFIT PLAN; THE NFL PLAYER DISABILITY & NEUROCOGNITIVE BENEFIT PLAN; THE BERT BELL/PETE ROZELLE NFL PLAYER RETIREMENT PLAN; THE DISABILITY BOARD OF THE NFL PLAYER DISABILITY & NEUROCOGNITIVE BENEFIT PLAN; DENNIS CURRAN; JACOB FRANK; BELINDA LERNER; SAM MCCULLUM; ROBERT SMITH; JEFF VAN NOTE; and ROGER GOODELL,

Defendants.

Case No. 1:23-cv-00358-JRR

**PLAN DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFFS' CLASS ACTION COMPLAINT**

On March 1, 2023, the Individual Defendants<sup>1</sup> filed a Consent Motion, ECF No. 17 (“Individual Defendants’ Consent Motion”), seeking an extension of their deadline to respond to Plaintiffs’ Class Action Complaint to April 21, 2023, which this Court granted on March 6, 2023. ECF No. 22. Pursuant to Local Rule 105.9, the other Defendants in this case – The NFL Player

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<sup>1</sup> The Individual Defendants are Dennis Curran, Jacob Frank, Belinda Lerner, Sam McCullum, Robert Smith, Jeff Van Note, and Roger Goodell.

Disability & Survivor Benefit Plan, The NFL Player Disability & Neurocognitive Benefit Plan, The Bert Bell/Pete Rozelle NFL Player Retirement Plan, and The Disability Board of the NFL Player Disability & Neurocognitive Benefit Plan (collectively, the “Plan Defendants”) – hereby move for the same extension to April 21, 2023 to respond to Plaintiffs’ Class Action Complaint for substantially the same reasons set forth in the Individual Defendants’ Consent Motion and so that all Defendants’ responses will be due on the same day. Counsel for the Plan Defendants have conferred with Plaintiffs’ counsel, and Plaintiffs consent to this Motion, conditioned on the Plan Defendants’ agreement, that, like the Individual Defendants, they will not oppose Plaintiffs having 45 days to oppose any motion(s) to dismiss.

The Plan Defendants respectfully request that the extension be granted, as set forth in the accompanying Proposed Order.

Dated: March 6, 2023

Respectfully submitted,

/s/ Edward J. Meehan

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Disability Board of the NFL Player  
Disability & Neurocognitive Benefit Plan*